

REMARKS

Claims 1 – 24 have been examined. Claims 1 – 6, 10 – 13, and 15 – 24 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Pat. No. 5,057,677 (“Bertagna”) in view of U.S. Pat. No. 4,913,341 (“Bachman”); Claims 7 – 9 stand rejected under 35 U.S.C. §103(a) as unpatentable over Bertagna and Bachman and further in view of U.S. Pat. No. 5,367,452 (“Gallery”); and Claim 14 stands rejected under 35 U.S.C. §103(a) as unpatentable over SBertagna and Bachman and further in view of U.S. Pat. No. 5,873,069 (“Reuhl”).

The Office Action relies on Bachman as disclosing the limitations defining aspects of the security-drawer assembly recited in the claims. Applicants respectfully disagree that Bachman discloses those limitations. Nevertheless, in the interest of advancing prosecution of the application, independent Claims 1 and 6 have been amended to clarify those limitations. These amendments merely make explicit what was previously implicit. Explicit support for the limitations may be found in U.S. Pat. Appl. No. 09/652,086 (the “'086 application,” now U.S. Pat. No. 6,619,770), which has been incorporated by reference (Application, p. 7, l. 13) and a copy of which was provided with the Amendment filed June 17, 2003. In particular, the security drawer has at least two positions when the security drawer assembly is mounted in the service cart: (1) a locked, closed position such that the body cannot be removed from the service cart ('086 application, p. 4, ll. 13 – 16); and (2) an unlocked, open position such that an interior of the security drawer may be accessed (*id.*, Fig. 4; p. 4, ll. 17 – 21; p. 11, ll. 8 – 14). The currency inventory may thus inherently be accessed when the security drawer is in the unlocked, open position.

The currency storage device disclosed in Bachman does not have two such positions. In particular, there is no unlocked, open position that permits access to the interior of the drawer in Bachman when assembly 14 is mounted in the currency storage stand. Indeed, to provide such access is antithetical to the purpose of Bachman, which is to provide a “drop box” (*see* Bachman, Col. 1, ll. 19 – 20) in which currency is deposited, but only removed periodically in a secure accounting area (*id.*, Col. 1, ll. 20 – 22). Such a mechanism is achieved by having

inner and outer currency storage trays that may be locked within the currency storage stand in such a fashion that the interior of the inner currency storage tray 18 (where currency is stored) is only accessible after the outer currency storage tray 16 has been removed from the currency storage stand (*id.*, Col. 2, ll. 58 – 63). Currency may be deposited through currency slots 46, 48, and 50, but are not disclosed as permitting access to the inner currency storage tray 18 in any position of the storage trays 16 and 18 (*see generally id.*, Fig. 1; Col. 3, ll. 58 – 62; Col. 5, l. 63 – Col. 6, l. 29).

Since the cited art fails to disclose the limitation of “a security drawer movably mounted in the sleeve [and] having, when the security drawer assembly is mounted in the service cart[,] an unlocked, open position such that an interior of the security drawer may be accessed when the security drawer is in the unlocked, open position,” independent Claims 1 and 6 are believed to be in condition for allowance. It is further noted that the cited art teaches away from this claim limitation by teaching the desirability of a structure that specifically lacks such a position, such teaching away having long been recognized as a strong indication that the proposed combination is *not* obvious. Each of the dependent claims is believed to be allowable by virtue of its dependence from an allowable independent claim.

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Amtd. dated August 11, 2005
Reply to Office Action of June 10, 2005

PATENT

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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